

From: Norman Usher [REDACTED]
Sent: 13 August 2021 09:28
To: localplans@charnwood.gov.uk
Subject: Objection to Charnwood Local Plan 2021 – 37: Specifically PSH025/HA17 – Moat Farm

Objection to Charnwood Local Plan 2021 – 37

Dear Sir/Madam,

Here we set out our objections to the Charnwood Local Plan, specifically with reference to the site designated as “PSH025/HA17 – Moat Farm” in the plans.

Having read through the plan, considering the criteria applied in selecting suitable sites and the scores that have been allocated to the criteria, we believe there are fundamental flaws in the decision.

Personal Details

Mr & Mrs Norman & Moira Usher,
[REDACTED]

Background

To provide some background on PSH025/HA17: it sits behind Priory Road, on land that slopes up away from the houses on that road. It is currently a farm field with rotational crops. It has several footpaths around the edges of the fields, that have proven ever more popular with walkers, including people with dogs. Some of the footpaths lead up to the Outwoods, providing a safe, traffic free area. During Covid lockdowns it has been a critically important green space where people can walk, admire the landscape (including the outwoods) and de-stress.

There is a ditch that runs behind the houses on Priory Road, that regularly fills up in the winter. Gardens along Priory Road have flooded, as recently as this year (winter 2020/21).

The traffic around this area is already significant, with queues to exit Valley Road onto Nanpantan Road and queues in both directions along Nanpantan Road backing up for over a mile towards and out of town.

With this context in mind, we were very surprised to see the assessments in Appendix C8 on page 52 of the Development Strategy and Site Selection Paper.

Flood risk

As noted above, there is already a flood risk to houses in this area – we are experiencing it. Building on land that slopes up away from houses along this street and that currently absorbs a large amount of rainfall will obviously worsen this situation. This is even if rainfall stays at current levels – it is widely recognised that the impacts of climate change mean we are likely to see increased rainfall, often in prolonged heavy downpours, and yet there appears to be no consideration of the impacts of climate change in the Charnwood plan. One example: there has recently been significant flooding in London, in areas that have not previously experienced it, so failing to consider climate change scenarios is a significant failing. Even without considering climate change impacts, assessing flood risk for this area as “A” (no significant adverse impacts) doesn’t have any logic; even more so since on a video call the planning department conceded that there were concerns about flooding in the woodbrook area and that there isn’t currently a plan of how to alleviate this. The risk also extends beyond this immediate area, as the water in the woodbrook runs into the soar valley, which already floods regularly and severely; and woodbrook has flooded the Epinal Way this winter. Concreting over PSH025/HA17 is going to exacerbate these problems.

Loss of open space / Outside green wedges

The area PSH025/HA17 identified for development is predominantly within the National Forest boundary. As noted above, it is a much-used green space, containing several footpaths. However, the area was assessed as “A” on both loss of open space and green wedges (ie no concerns)! This does not make sense.

Biodiversity

PS025/HA17 does not appear as one of the areas considered in Appendix D – Additional Biodiversity Evidence. This area is frequented by Badgers, Foxes, Hedgehogs, Bats, Newts, Owls and a wide variety of birds - not surprising given the proximity of the Outwoods. So, it seems a significant flaw that a more detailed analysis of the biodiversity has not been carried out.

Transport and Air Quality

There is no evidence that traffic levels have been considered. As noted above, there is already congestion around this area, as there is around Loughborough in general, particularly Epinal Way. The town is also in close proximity to the M1 motorway and a large incinerator is being built beside the motorway – these all contribute to worsening air quality. Loughborough cannot accommodate an increase in housing of this magnitude without severe harm to the already stressed traffic situation and consequently the air quality.

Lack of weighting of criteria

Sites have been excluded if they score an “X” on any one of the criteria (ie cannot be mitigated), whereas sites that scored a “C” on multiple criteria have been put forward. A “C” means it is accepted that there are “significant adverse impacts” which will need to be mitigated. As a result of this, several sites have been excluded because they are not within 200m of a bus route even though they meet all the other criteria. No weighting has been applied to any of the criteria: being within 200m of a bus route is given the same importance as a risk to flooding existing houses. This cannot be correct.

Other points

It is not clear why PSH385 was ruled out because “previous outline permission had lapsed”. Why does this discount it from being included? This is a brownfield site area and therefore would cause less impact on the environment if it was developed. There may be other similar locations that have been excluded.

Although primary school provision has been considered, there is inadequate consideration of health provision. GP surgeries in Loughborough are already over-stretched and there is no detail on how the town will be able to provide more healthcare facilities or staff, or consideration of the impacts on hospitals.

Within the context of the National Planning Policy Framework

The proposed development of PSH025/HA17 conflicts with the following paragraphs of the National Planning Policy Framework:

- To protect and enhance our natural....environment (para. 8c)
- Improving biodiversity (para. 8c)
- Mitigating and adapting to climate change (para. 8c)
- Take local circumstances into account to reflect the character, needs and opportunities of each area (para. 9)
- Improve the environment; mitigate climate change (para. 11a)
- Strategy must make sufficient provision for.....flood risk (para. 20b)
- Provide proportionate evidence (para. 35b)
- Improve economic, social and environmental condition of the area (para. 38)
- Existing open space should not be built on unless (following criteria not met) (para. 99)
- Planning policies and decisions should protect and enhance public rights of way and access (para. 100)
- All developments that will generate significant amounts of movement should be required to provide a travel plan and supported by a transport statement / assessment (para. 113)
- Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future) (para. 159)

Summary

Selecting site PSH025/HA17 is inconsistent with Charnwood Council's stated intent to "create healthier communities", to take "careful consideration of the effects of climate change and how to manage the risk of flooding" and "protection of the intrinsic character of the countryside". If these criteria had been applied correctly, PSH025/HA17 would be deemed inappropriate for development. Also, the criteria should be weighted. There are ~200 houses allocated to this site, in the context of a plan that exceeds the requirement for housing over the 15 year period by 1,778 and with other more suitable sites excluded for less significant reasons. The plan is in contravention of the NPPF as outlined above.

We hope that you will give due weight to these objections,
Yours Sincerely

Norman & Moira Usher,

